

**BRAC CLEANUP TEAM
HUNTERS POINT SHIPYARD
MEETING MINUTES
October 25, 2001**

**SFUND RECORDS CTR
2229344**

These minutes summarize the Hunters Point Shipyard (HPS) Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting held on October 25, 2001, at the office of Tetra Tech EM Inc., San Francisco, California. The meeting was attended by the BCT, which is composed of the Navy, the U.S. Environmental Protection Agency (EPA), and the California Department of Toxic Substances Control (DTSC). The meeting was also attended by the City of San Francisco, its team of developers, and Navy consultants. A list of attendees is included as Attachment A to these minutes. These minutes discuss the key points, decisions, and action items agreed to at the meeting. A complete list of action items is included as Attachment B to these minutes.

AGENDA

- Introduction
- FFA Schedule
- Review of Action Items
- Parcel B Update
- Parcel C Soil Removal and Dry Dock 4 Removal Action Update
- Lunch Break
- Parcel C and E Information Packages, Groundwater Data Gaps Summary
- Groundwater Treatability Studies Update
- Parcel D Feasibility Study Progress Update
- Parcel E Update - Overview
- Parcel F Update - Overview
- RCRA Waste Consolidation
- Radiation Update
- Community Meeting October 27, 2001
- FFA Schedule Wrap-up

INTRODUCTIONS/REVIEW AGENDA/ANNOUNCEMENTS

EPA is changing its phone system on Monday, October 29, 2001, which will result in all EPA personnel receiving new phone numbers. EPA will send out an e-mail with the new numbers soon. EPA noted the old numbers should work for an unspecified interim period, but there will be no voice-mail associated with the old numbers. Claire Trombadore's new number will be 415-972-3013.

EPA has a new administrator for Region 9, Wayne Nastri.

FFA SCHEDULE

Parcel B

Land Use Control Implementation Plan (LUCIP) - EPA will write a formal dispute letter for the Parcel B LUCIP.

Parcel B groundwater documents - The Navy was ready to submit the revised Parcel B remedial action groundwater monitoring plan (RAMP) and associated technical memorandum on October 15, 2001; however, EPA requested that the Navy not submit the documents until the explanation of significant differences (ESD) is resolved. The Navy does not plan on sampling during the January-March 2002 quarter of groundwater monitoring, since it is in the process of evaluating a revised program in accordance with the approved RAMP. EPA requested that the Navy sample under the existing program

for the January-March 2002 event, because it will provide more data for evaluating the Navy's upcoming proposal. The Navy disagreed with EPA, because there were not exceedences of trigger levels in the sentinel wells and there is a 5-year time frame for contaminants to travel from the sentinel wells to the point of compliance (POC) wells. EPA requested the Navy to get the revised groundwater documents out soon, so the process can move forward. The Navy will get them out and then sample under the new program – assuming it will be approved. DTSC agreed with EPA.

ESD – The Navy has received comments on the ESD from DTSC and EPA. EPA noted that the California Regional Water Quality Control Board (RWQCB) would be submitting comments soon.

Follow-up – The RWQCB stated they would submit comments by November 9, 2001. Navy management is working to address the EPA and DTSC comments and will incorporate responses to RWQCB comments as well. A definitive schedule is not yet available, pending receipt of RWQCB comments.

Construction Summary Report (CSR) – The CSR schedule is still slipping on a day-for-day basis, until the manganese issue and ESD can be resolved.

Parcel C

There are no proposed changes to the Parcel C schedule at this time.

Parcel D

Time-critical removal action (TCRA) – There was a four-day slip in the schedule, which also affects the feasibility study schedule accordingly.

Final soil and pipeline removal workplan – The Navy is waiting for DTSC comments on the Navy's response to comments on the draft work plan. DTSC does not plan on responding with any comments at this time. The Navy plans to finalize the work plan in about 30-days.

Parcel E

Data Gap Work Plan – The Navy proposed an all-day meeting on November 14, 2001 to discuss outstanding data gap work plan issues. DTSC and EPA concurred.

Radiation

Historical radiological assessment (HRA) – The Navy needs access to City records to complete its HRA. The City stated it would be a time-consuming to get access to all the records, but it will cooperate with the Navy. **Follow-up – The radiation removal action closeout report will be delayed due to continued fieldwork associated with Building 364. The new date is being set for March 4, 2002 to coincide with submittal of the draft final Parcel D FS. The Basewide radiation removal action Action Memorandum will be distributed next week.**

TPH

Draft sampling plan for Parcels C, D and E - The Navy has not received comments from the RWQCB on any submitted documents since July 2001. **Follow-up – The RWQCB will submit comments on November 9, 2001. The Navy will begin implementing fieldwork next week and will make field adjustments based on the RWQCB comments. A site tour is scheduled for December 5, 2001 with the RWQCB and any other interested parties.**

BCT Meetings

The EAP and DTSC agreed to continue meeting on the second Tuesday of each month. This schedule will be confirmed with the RWQCB.

REVIEW OF ACTION ITEMS

All agreed that all outstanding action items are now outdated. (Those items are not shown in the attached action item list.)

PARCEL C SOIL REMOVAL AND DRY DOCK 4 REMOVAL ACTION UPDATE

The Navy presented an update of the Parcel C soil removal action and Dry Dock 4 removal action. DTSC is concerned about referring to the TCRA cleanup goals as final cleanup goals for the excavated sites. The Navy noted it understands the TCRA goals are not final at this time.

DTSC asked the Navy what the sample frequency and protocol are for the clean backfill coming from the Bay Area Rapid Transit (BART) system project. The Navy stated they would add that information to the meeting minutes. **Follow on - One four-point composite sample is taken from every 10,000 cubic yards of material and analyzed for volatile organic compounds, semi-volatile organic compounds, organochlorine pesticides/polychlorinated biphenyls, total petroleum hydrocarbons (TPH) as gasoline, diesel, and motor oil range, metals, and pH.**

The EPA and DTSC asked the Navy where the soil vapor extraction (SVE) systems are in place. The Navy has SVE treatment systems at the following areas: installation restoration (IR) site 10, building 123; IR-28, building 231; IR-28, building 251; IR-28, buildings 211/253; IR-25, building 134; IR-28, building 272; and IR-36, building 406.

The City was concerned about using the term "emergency" removal action for the Dry Dock 4 removal action. The Navy noted that the terminology used is in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) guidance. The BCT asked to have photographs of the removal action. The Navy will prepare a removal action closeout report with photographs to document the removal action. EPA wanted to know what the remaining risk would be from the material left in place at the dry dock. DTSC requested a core sample of the material and asked about potential radioactivity of the material. The EPA noted that the only radioactive item ever found at the dry dock above background levels was one radium dial. The Navy noted that the removed sediment was scanned for radiation, and none was found to contain radioactivity. The Navy will consider sampling *in situ* material, or might consider sampling existing removed material if it is representative of the *in situ* material. **Follow-up – The Navy has collected several chunks of the hard sediment material from the bins. This material will be sent to a lab for STLC analysis using both DI water and Bay water. The samples will be analyzed for full suite analyses to see the potential (worst case) leachability for evaluation of the long-term effectiveness of this action during the FS.**

EPA noted it does not believe the Navy has properly delineated all Parcel D TCRA sites. The Navy asked EPA if it would be willing to resolve questions on the report prior to completing its review. EPA agreed to discuss its concerns with the Navy. The BCT asked the Navy how it would determine cleanup goals for Parcel D. The Navy is running risk grids as was done for the remedial investigations. Additional risk grids will be run screening out Hunters Point ambient levels and ND sample results to evaluate the site for Proposition P purposes.

PARCEL C AND E INFORMATION PACKAGES, GROUNDWATER DATA GAPS SUMMARY

The Navy anticipates it can prepare the Phase III field sampling plan/quality assurance project plan (FSP/QAPP) in approximately three weeks, once comments are received on the Parcel C and E groundwater information packages. DTSC is working on its comments now, and expects to submit them in about two weeks. DTSC requested that the Navy include its groundwater conceptual model in the groundwater information packages. The Navy believes it might not have enough data to develop that model yet, and proposed placing it in Phase III FSP/QAPP. DTSC agreed with the Navy's proposal. The Navy also plans to build on the existing groundwater data to address BCT comments on the previous

Parcel E tidal studies. **Follow-up – There will be a GW meeting with the RWQCB and other interested parties on November 28, 2001. Following that meeting, the RWQCB will submit their comments on the information packages to allow completion of the Phase III FSP/QAPP.**

DTSC was concerned about risk-based groundwater exceedences and wants a clear picture of total risk from groundwater at the site. DTSC assumed that all areas were drinking water areas, and did not agree with all of the Navy's screening criteria in the information packages. The Navy noted that there are many areas that do not have drinking water concerns. DTSC believes that during the investigation phase, the Navy should set the screening criteria at the lowest possible levels (assuming drinking water use of the groundwater), and screen out and evaluate data during the feasibility study FS phase.

DTSC asked the Navy whether it was sampling for total chromium and chromium VI. The Navy will get back to DTSC to confirm.

DTSC noted it will be requesting total risk runs, and will not accept screening out of ambient or background levels. The Navy plans on moving forward based on the agreements made at the January 18, 2001 management meeting. DTSC does not believe those agreements apply to their request.

DTSC asked the Navy about the status of the beneficial use letter. The Navy has received comments and is considering whether it needs to respond to the BCT's comments. EPA asked the Navy to respond to the comments.

GROUNDWATER TREATABILITY STUDIES UPDATE

The Navy presented information regarding its planned groundwater treatability studies for the Hunters Point Shipyard.

The Navy plans to respond to EPA's comments on the chemical oxidation treatability study. Once funding is available, the proposed zero valent iron injection treatability study work will begin. Web sites providing additional information about the zero valent iron injection technology include www.arstechnologies.com and www.ifracture.net.

ArcEcology asked about fugitive emissions from the site due to the proposed implementation of the zero valent iron injection innovative technology. DTSC asked about potential issues regarding interference from other chemicals in the groundwater. The Navy noted that there has never been a case where there were fugitive emission from the injection technology, and also noted that none of the known contaminants in the groundwater would negatively affect this technology.

PARCEL D FEASIBILITY STUDY PROGRESS UPDATE

EPA wanted to know if the Navy planned on addressing risk from soil in the upper 10 feet, and, if risk exceeded goals for the planned reuse, whether institutional controls (ICs) would be set for those areas. EPA also asked the Navy if the document would be considered a revised FS. DTSC asked the Navy if it would address the soil to groundwater pathway. The Navy will have remedial action objectives (RAOs) stated in the FS, and believes it has met those objectives; therefore, no further risk assessment would be needed. The Navy will title the new document the Revised FS. The Navy will briefly address the soil to groundwater pathway, based on pervious discussions with the BCT.

DTSC is concerned that the Navy considers the removal actions to be final actions, and does not believe there can be an agreement for no further action (NFA) until a cleanup goals is set in the record of decision (ROD). The Navy noted that the removal action sites will meet RAOs, and that it will document the proposed cleanup levels in the ROD. DTSC agreed with the Navy.

PARCEL E UPDATE - OVERVIEW

The Navy is looking at areas on Parcel E to perform additional work assuming the \$50.6 million in funding that Senator Feinstein got approved is received; however, that funding has not yet been appropriated. The Navy is looking at pursuing an extension of the landfill cap to address BCT comments. That work would include addressing the nearby wetlands for the possible cap extension. The Navy noted it has a draft internal operation and maintenance plan in place for maintaining the current landfill cap.

DTSC considers the entire shoreline (at Parcels B and E) at the site a priority. DTSC is also concerned about landfill gas monitoring at the landfill, and would like some data to be collected before the final data gap document is approved.

DTSC suggested that the Navy break up the data gap document into separate deliverables to help expedite the landfill gas data gap assessment, and to make the landfill gas document a secondary deliverable. The Navy is concerned about breaking out portions of the primary document and making them secondary documents. The Navy prefers addressing all Parcel E data gap issues in one document; however, it will consider DTSC's proposal and recommended having a meeting to discuss landfill and soil data gap issues on November 14, 2001. The BCT agreed to meet on that date. EPA recommended having a soil-gas sampling strategy in place for the meeting. The Navy will look into it.

PARCEL F UPDATE - OVERVIEW

As of October 19, 2001, the Navy has collected all sediment samples on Parcel F. The status of the sampling effort is summarized below.

- Sediment chemistry – 28 percent in progress, 31 percent validated, 41 percent finalized
- Sediment water interface – done, all data validated
- Amphipod toxicity testing – done, all data in validation
- Bioaccumulation testing – done, all data in validation

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) WASTE CONSOLIDATION

The Navy is planning on moving forward with its RCRA waste consolidation efforts. A work plan for this effort will likely be ready in early November 2001. The work will begin by addressing industrial process equipment (IPE). DTSC requested thorough documentation of the RCRA waste consolidation efforts from the Navy. The Navy agreed to DTSC's request. The Navy noted that RCRA activities will mainly focus on Parcels C, D, and E, since there are no issues on Parcel A, and very few issues on Parcel B. EPA asked the Navy how it would document those activities. The Navy will prepare a summary report to support the finding of suitability to transfer (FOST). EPA asked to have this activity added to the FFA schedule.

RADIATION UPDATE

The Navy is still working on clearing building 364, which is near completion, and will perform further investigations on the outside drain and pipes. The Navy has also found low-level contamination in the drain pipes at building 707, and on the pad at the building 707 waste consolidation area. The Navy will remove or clean the pipes and further investigate the pad area.

The Navy is presently reviewing an internal copy of the radiation action memorandum. Once it is finalized, the Navy will distribute it. The action memorandum generally states that if radiation is found at the base, the Navy will remove it. EPA noted it likes the Navy's strategy. The Navy anticipates submitting the document in the next couple of weeks.

The Navy noted it has found records regarding the activities of Triple A. Triple A was not known to have generated radioactive waste, but did dispose non-radioactive sandblast grit around the site.

EPA asked the Navy if building 365 would be investigated. The Navy noted it has already investigated the building.

COMMUNITY MEETING OCTOBER 27, 2001

The restoration advisory board (RAB) workshop, training and open house event will be held this Saturday, October 27, 2001, at Treasure Island. The Navy will be discussing its guidance documents, policies, funding procedures, etc. at the meeting. The City noted that the HPS community requested Hunters Point-specific training. The Navy is aware of the request and will address their concerns at a later date. **Follow-up – Those who attended the workshop were very pleased with the event. Approximately 75-100 people attended the workshop.**

FFA SCHEDULE WRAP-UP

DTSC asked for documentation describing changes to the FFA schedule and how the BCT arrived at the revised schedule. EPA agreed with DTSC and noted it needs that information for its site file. The Navy does not include the FFA schedule in its administrative record, and does not want to issue a new schedule and letter for every change. DTSC believes FFA schedule changes should be addressed with written requests. The Navy asked DTSC if it agreed that if DTSC missed a review deadline on a primary document without requesting an extension in writing, whether DTSC would consider that document approved by DTSC. DTSC stated that it agrees the primary document would be approved under that scenario.

The Navy plans to submit periodic FFA schedule updates with formal cover letters to address the BCT's concerns.

The following changes to the FFA schedule were discussed at the meeting, and are noted by line number as documented on the September 10, 2001 revision date schedule printout.

- The Navy will add BCT meetings for calendar year 2002 – inserted after line 13
- The Parcel B annual groundwater monitoring report will be changed to a quarterly report - line 89
- The submittal date for the revised Parcel B RAMP and groundwater technical memorandum has been tentatively changed to November 20, 2001 - line 105; **Follow on – the documents will now be submitted separately with a new date for the technical memorandum of November 28, 2001. No revised date has yet been set for the revised RAMP.**
- The BCT review period for the revised Parcel B RAMP and groundwater technical memorandum was changed to 30 days from 45 days - line 106
- The Parcel B October-December 2002 quarterly groundwater monitoring report was changed to the annual report – line 146
- The Navy will update the ESD schedule based on management decisions – lines 261-266
- Lines 336-344 will be rolled up, since the Parcel D pre-excavation confirmation sampling is complete
- The Navy plans to submit the final pipeline and soil removal work plan in 30 days – line 355
- Completion of the draft sampling and analysis plan for the TPH data gap is pending receipt of RWQCB comments – lines 382-383
- Completion of the Phase III FSP/QAPP addendum is pending receipt of RWQCB comments - line 473
- The landfill TCRA close-out report submittal date will be based on the outcome of the November 14, 2001 meeting – lines 721-727

- The draft final Parcel E data gaps document submittal date will be based on the outcome of the November 14, 2001 meeting - lines 745-749

The Navy also plans to roll up other tasks that have been completed.

Hunters Point Shipyard Meeting Attendance Sheet

Organization	Name	Phone Number	E-Mail Address
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**ATTACHMENT B
HPS BCT ACTION ITEMS**

Action	Date Identified	Responsible Party	Date Due	Date Accomplished	Notes
Parcel B. EPA will write a dispute letter for the Parcel B LUCIP.	25-Oct-01	Claire Trombadore	TBD		
Parcel s C & E. The Navy will get back to DTSC whether it sampled for total chromium and chromium VI in groundwater.	25-Oct-01	Pat Brooks (Navy)	TBD		

Hunters Point Shipyard Meeting Attendance Sheet

Topic: BCT Meeting

Location: Tetra Tech EM Inc.

Date/Time: October 25, 2001; 10:00 AM

Organization	Name	Phone Number	E-Mail Address	Present
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